

Privacy Statement

September 2020

Introduction

This statement describes how Personal Data you submit via the Greenergy website is collected, handled, stored, disclosed and otherwise processed to meet Greenergy's data protection standards and to comply with applicable Data Protection Legislation.

Greenergy regards the lawful and correct treatment of Personal Data as integral to our successful operations, and to maintain the confidence of the people we work with. To this end, we endorse and adhere to the principles of the Data Protection Legislation.

Definitions

"Data Protection Legislation" means the EU Data Protection Legislation and the other applicable data protection legislation in other jurisdictions which may be applicable to you.

"Greenergy", "we" or "us" means Greenergy Group Holdings Limited and its wholly-owned subsidiaries.

"Greenergy website" means greenergy.com.

"Personal Data" means any data which relates to an individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Greenergy (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Greenergy or any other person in respect of an individual.

The types of personal data we collect

By visiting the Greenergy website and contacting us by details provided in the Contact us section (either by phone or email), we may collect certain information about you. The collected Personal Data may include:

- » contact details, such as your name, title, company/organisation name, e-mail address, telephone and fax numbers, and physical address;
- » feedback from you about our products (including our websites).

Please note that you can visit the Greenergy website without providing any Personal Data directly to us. The quality of content will not be affected.

We also discourage you from submitting sensitive Personal Data on this website.

How we use your personal data

Your Personal Data may be stored and processed by Greenergy including in the following ways and for the following purposes:

- » to manage our relationship with you;
- » to understand your needs and interests and to respond to your enquiries;
- » to analyse and improve our services;
- » for the management and administration of our business;
- » to provide you with the products you requested;
- » in order to comply with and in order to assess compliance with applicable law, rules and regulations, internal policies and procedures; or
- » to detect, investigate and prevent fraud and other crimes or malpractice and for obtaining legal advice.

Greenergy is entitled to use your Personal Data in these ways as may be applicable:

- » if Greenergy has obtained your consent;
- » in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings;
- » in relation to its legal or regulatory obligation that has to discharge;
- » for Greenergy's legitimate business and proprietary interests such as:
 - allowing Greenergy to effectively and efficiently manage and administer the operation of its business;
 - for internal research purposes.

If you are located in a jurisdiction which requires us to obtain your consent to collect, use, store, process and disclose your Personal Data, you understand that by providing us with information through this Website, you are agreeing to our collection, use and disclose your personal information as described in this Policy.

Disclosure of your personal data to third parties

Greenenergy will not share your Personal Data with third parties to get value from the data, for instance selling the data for marketing lists.

We share Personal Data among our affiliates and business units, whose services are integral to the services we offer, but only in circumstances where such sharing conforms to law and our policies, in the circumstances outlined below:

- » the management and administration of Greenenergy's business (including the management of your requests) and the administration of this website.

Greenenergy may also share your Personal Data outside of Greenenergy with third parties for the following purposes:

- » with third party service providers for the purposes of providing services to us (for example, Greenenergy's web developers, IT, external advisors, talent management platform provider). These third parties will be subject to confidentiality requirements and they will only use your Personal Data as described above;
- » to the extent required by law, for example if Greenenergy is under a duty to disclose your Personal Data in order to comply with any legal obligation; or to establish, exercise or defend its legal rights. This may include disclosure to regulatory bodies; or
- » if Greenenergy is acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer.

International transfers

We operate globally and therefore your Personal Data may be processed and disclosed as described above in any country in which we conduct business or have a service provider. We will only transfer your Personal Data internationally if such processing is necessary and justifiable by the way we manage our business. Accordingly, when you provide your Personal Data to us, you acknowledge and agree that we may disclose your Personal Data to recipients located in jurisdictions other than your own, including but not limited to Australia, Brazil, Canada, China, India, Ireland, Netherlands, Singapore, UAE, UK and USA.

To the extent that applicable Data Protection Legislation does not allow or permit us to obtain your valid consent by virtue of providing this Policy to you, or otherwise rely on the other grounds set out in this Policy for disclosing your Personal Data outside of your jurisdiction under the data protection and privacy law of your jurisdiction, we will obtain your explicit consent through other means.

In all cases, Greenenergy will ensure that any transfer of your Personal Data is compliant with applicable Data Protection Legislation.

How we safeguard your information

Greenenergy has commercially reasonable controls in place to maintain the security of our information and information systems. Files are protected with safeguards according to the sensitivity of the information contained therein. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.

As a condition of employment, Greenenergy employees are required to follow all applicable laws and regulations, including in relation to Data Protection Legislation. Access to Personal Data is limited to those employees who need it to perform their roles. Unauthorised use or disclosure of confidential client information or Personal Data by a Greenenergy employee is prohibited and may result in disciplinary measures.

Links to other websites

The Greenenergy website may contain links to other websites. This document does not cover the information and privacy practices of other websites linked to the Greenenergy website, nor do we control or endorse their content or privacy policies. Once you access another site, you are subject to the privacy and security policies of the new site. We strongly encourage you to read the privacy policies of all websites you visit, before you share any personal information on a website.

Retention of personal data

How long Greenenergy will hold your Personal Data for will vary and will be determined by the following criteria:

- » the purpose for which Greenenergy is using your Personal Data – Greenenergy will need to keep the Personal Data for as long as is necessary for that purpose; and
- » legal obligations – laws or regulation may set a minimum period for which Greenenergy has to keep your Personal Data.

Depending on the requirements of the data protection law of your jurisdiction, Greenenergy will take reasonable steps using appropriate technical methods in the circumstances to delete or destroy your Personal Data when we no longer have a legal basis to retain it or to ensure that the information is anonymised or irrecoverable.

Your rights

To the extent provided by the laws of your jurisdiction, you may have legal rights in relation to the Personal Data we hold about you. These rights may include:

- » the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which Greenergy holds about you;
- » the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that Greenergy may still be entitled to process your Personal Data if it has another legitimate reason (other than consent) for doing so; in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that Greenergy transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided to Greenergy;
- » the right to request that Greenergy rectify your Personal Data if it is inaccurate or incomplete;
- » the right to request that Greenergy erase your Personal Data in certain circumstances. Please note that there may be circumstances where you can ask Greenergy to erase or destroy your Personal Data but Greenergy is legally entitled to retain it;
- » the right to request that Greenergy restrict its processing of your Personal Data in certain circumstances. Again, there may be circumstances where you ask Greenergy to restrict its processing of your Personal Data but Greenergy is legally entitled to refuse that request; and
- » the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by Greenergy.

You can enquire about your rights, which are applicable to you, by contacting Greenergy, using the details listed in the section Questions and concerns.

Use of personal data in relation to data subjects in canada and australia

Canada's Anti-Spam Legislation requires that a commercial electronic message ("CEM") sent within Canada or into Canada from another jurisdiction may only be sent to individuals who opt-in to receiving them, subject to certain exceptions. Similar legislation applies in Australia (Spam Act 2003). Such consent may be implicit, such as by engaging in a prior business relationship, or by virtue of having one's email address listed in a public directory.

These anti-spam laws also require senders to include an opt-out function within a CEM to allow you to opt-out of the collection or use of your information by Greenergy. In some cases, withdrawing your consent to the collection, use or disclosure of some or all of your personal information will prevent us from providing services to you. To opt-out, please contact Greenergy's Data Protection Officer using the details set out below or use the opt-out facility provided in the CEM. Please note that in some cases Greenergy is permitted to send you certain CEMs after you opt out, such as where required to enforce legal rights. QUESTIONS AND

Questions and concerns

If you have any questions or concerns about Greenergy's handling of your Personal Data, or about this Statement, please contact our Data Protection Officer using the following contact information:

Address:

Greenergy
198 High Holborn
WC1V 7BD
LONDON
United Kingdom

Attention:

Data Protection Officer

Department:

Legal & Compliance

Email Address:

privacy@greenergy.com

To the extent permitted by applicable law, we may record and monitor electronic communications (including e-mail and telephone) to ensure compliance with our legal and regulatory obligations and internal policies.

Additional notes

- » If you are a Greenergy customer or supplier, more information regarding the collection and processing of your Personal Data can be found in Greenergy's Customers and Privacy Notice available on this website.
- » If you make an application for employment with any company of Greenergy group, the collection and processing of your Personal Data is detailed in Greenergy's Applicant Privacy Notice available on this website.
- » Our Website is not directed at children, and we do not knowingly collect personal information from children under 13.